

FILED

JUN 22 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL REEVES,

Defendant.

4:16CR264 AGF/NAB

INDICTMENT

The Grand Jury charges that:

Count 1

Title 21, United States Code, Section 843(a)(3)
Obtaining Controlled Substances by Fraud and Deception

1. At all relevant times, Paul Reeves (Reeves) was a resident of St. Louis County, Missouri. Reeves is not a medical doctor or otherwise qualified or authorized to prescribe medications.
2. At all relevant times, Dr. Rhoderic Mirkin, Dr. Peter Bettonville, and Dr. Richard Lehman were medical doctors with offices and practices in St. Louis County, Missouri.
3. Certain prescription drugs are defined by federal and state law as controlled substances, which are drugs that have some potential for abuse or dependence. Controlled substances are placed into one of five schedules, based on the potential for abuse and the severity of the effects if a person abuses the drug.
4. Tramadol is a drug that is used to treat moderate to severe pain. As of August 18, 2014, the U.S. Drug Enforcement Administration (DEA) classified Tramadol as a Schedule IV

controlled substance. Only authorized prescribers may prescribe Tramadol and pharmacists may only dispense Tramadol pursuant to a prescription from an authorized prescriber.

5. From in or about 2013 through at least December 2015, without legal authority, Reeves used the names of several medical doctors, including Dr. Mirkin, Dr. Bettonville, and Dr. Lehman, on fraudulent prescriptions to obtain Tramadol and other prescription drugs on numerous occasions. These doctors had not treated Reeves, did not prescribe Tramadol for him, and had no knowledge of the fraudulent prescriptions until the investigation began.

6. On the fraudulent prescriptions, Reeves listed himself as the patient, but also used other names, including Michelle Reeves, Michael Robbins, and Michelle Deane. Michelle Reeves is the estranged wife of Reeves; "Deane" is her maiden name. Michelle Reeves was never a patient of the doctors listed above.

7. Reeves presented the fraudulent prescriptions to pharmacies in St. Louis County, including various Walgreens, Walmart, and Schnucks pharmacies.

8. From on or about March 6, 2013, through August 17, 2014, Reeves presented or caused to be presented 14 fraudulent Tramadol prescriptions (50mg, 180 and 240 count) at various Walgreens pharmacies. The fraudulent Tramadol prescriptions total 3180 pills. Michelle Reaves is listed as the patient and Dr. Mirkin is listed as the prescribing doctor.

9. On or about October 27, 2014, Reeves presented or caused to be presented one fraudulent Tramadol prescription (50mg, 240 count) at a Walmart pharmacy. The fraudulent Tramadol prescription totaled 240 pills. The patient is identified as Michelle Deane and Dr. Mirkin is listed as the prescribing doctor.

10. From on or about October 25, 2013, through November 13, 2014, Reeves presented 21 fraudulent Tramadol prescriptions (50mg, 240 count) to various Walgreens,

Walmart, and Schnucks pharmacies. The fraudulent prescriptions total 5040 pills.

Dr. Bettonville or Dr. Lehman is listed as the prescribing doctor on the prescriptions and the patient is listed as Paul Reeves.

11. From on or about January 1, 2013 through December 3, 2014, Reeves presented or caused to be presented 14 fraudulent Tramadol prescriptions (50mg, 240 count) to Walgreens and Walmart pharmacies. Dr. Bettonville or Dr. Lehman is listed as the prescribing doctor. The patient is identified as Michael Robbins, but the birthdate associated with the prescription is the same as Michelle Reeves' birthdate.

12. On or about August 12, 2014, Reeves presented or caused to be presented one fraudulent Tramadol prescription (50mg, 240 count) to a Schnucks pharmacy. Reeves is listed as the patient and Dr. Bettonville is listed as the prescribing doctor. On or about November 1, 2014, Reeves was videotaped when he picked up the Tramadol.

13. On or about November 2, 2014, Reeves presented or caused to be presented one fraudulent Tramadol prescription (50mg, 240 count) to a Schnucks pharmacy. Reeves is listed as the patient and Dr. Lehman is listed as the prescribing doctor. Reeves paid for the Tramadol with a credit card issued by Central Bank to Reeves at his home address in Fenton, Missouri.

14. On or about December 18, 2014, a prescription bottle was recovered from a spare bedroom in a home where Reeves had previously resided with his wife. The bottle contained the following information:

Facility: Walgreens, 1391 Big Bend Road, Ballwin, Missouri
RX: 2067685-01273
Drug: Tramadol 50mg/240 Count
Physician: Peter Bettonville M.D.
Patient: Paul REEVES,
Cypress Trail Lane, Fenton, Missouri 63026

15. On or about November 2, 2014, in St. Louis County, Missouri,

PAUL REEVES,

the defendant herein, did knowingly and intentionally acquire and obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, and subterfuge; that is, he presented a fraudulent prescription, with Dr. Richard Lehman falsely identified as the prescriber, to a Schnucks pharmacy and obtained 240 Tramadol pills, a Schedule IV controlled substance.

All in violation of Title 21, United States Code, Section 843(a)(3).

The Grand Jury further charges that:

Count 2
Title 18, United States Code, Section 1028(a)(1)
Identity Theft

16. Paragraphs 1 through 14 are incorporated by reference as if fully set out herein.

17. On or about August 12, 2014, in St. Louis County, within the Eastern District of Missouri,

PAUL REEVES,

the defendant herein, did knowingly and without legal authority produce an identification document, authentication feature, and false identification document; that is, he used the name of Dr. Peter Bettonville and his DEA registration number on a fraudulent prescription to obtain Tramadol pills, a Schedule IV controlled substance.

All in violation of Title 18, United States Code, Section 1028(a)(1).

A TRUE BILL.

FOREPERSON

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